



DATE: March 5, 1993

TO: Terry Ayers

Attn: Fred Nika;

FROM: Jim O'Brien

By: Connie Sullinger CAS

SUBJECT: Review of Draft Remedial Design/Remedial Action Work Plan
and Draft Groundwater RD Work Plan
Winnebago Reclamation Landfill (Pagel's Pit)

We have completed our review of the two documents referenced above which were prepared for the Winnebago Reclamation Landfill site. We have the following comments.

Draft Groundwater RD Work Plan

Page 7; Section 2.5.1; last paragraph and Table 10: The consultant needs to explain how the groundwater analytical parameters listed in Table 10 were developed. For example, nickel and cyanide were included in the risk assessment as contaminants of concern for the site but are not included in the list of analytes for groundwater sampling to be conducted under this work plan.

Draft Remedial Design/Remedial Action Work Plan

Page 9; Section 3.2.3; Groundwater Cleanup Performance Standards and System Shutdown: The consultant states that the Groundwater Cleanup Performance Standards for the system shutdown, for those chemicals without MCLs or MCLGs, will be the cumulative carcinogenic risk of 10^{-5} or the cumulative hazard index (HI) for 1,1-dichloroethene, arsenic, and other contaminants without MCLs or MCLGs. 1,1-Dichloroethene has a MCL of 0.007 mg/l and arsenic has a MCL of 0.05 mg/l which makes the aforementioned statement inaccurate. In addition, the Illinois Groundwater Standards are also applicable in groundwater at this site.